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## ATTORNEY FOR CREDITOR: CONSUMER PORTFOLIO SERVICES

## IN THE BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY (CAMDEN) HONORABLE JERROLD N. POSLUSNY, JR.

::•	Case No. 17-28396-JNP
:	
	Chapter 13 Hearing Date:
	:

## CERTIFICATION IN SUPPORT OF MOTION OF CONSUMER PORTFOLIO SERVICES FOR RELIEF FROM THE AUTOMATIC STAY

## Daniela Garret certifies as follows:

- 1. I am employed by Consumer Portfolio Services, ("CPS") and am familiar with the facts of this case.
- 2. On April 30, 2016, Debtor executed a Retail Installment Sale Contract for the purchase of a 2009 BMW 3 Series Sedan 4D 335xi AWD 3.0L I6 Turbo VIN WBAPL33579A407171 (the "Vehicle"). CPS has a security interest in the Vehicle, copies of the Contract and Title are attached hereto as Exhibits A and B, respectively.
- 3. The payoff under the contract as of January, 2018 is \$14,848.01, which includes interest at 18.45%.
- 4. The Contract requires 60 monthly payments in the amount of \$413.41, with the payments due on the  $30^{th}$  of each month.

- 5. The existing delinquency under the Contract is \$2024.31. A copy of the payment history is attached hereto as Exhibit C.
- 6. The N.A.D.A. value for the Vehicle is \$11,100. A true and correct copy of a printout showing that value is attached hereto as Exhibit D. Therefore, there is no equity in the Vehicle.
- 7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 1/17/18

Daniela Garret

Bankruptcy Representative